

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 1:23-cv-23004-WPD**

JANE DOE, a minor, by and  
through her mother and next  
friend, MOTHER DOE,

Plaintiffs,

v.

ACADEMIR CHARTER  
SCHOOLS, INC. AND  
SUPERIOR CHARTER SCHOOL  
SERVICES, INC.

Defendants.

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**DEFENDANT ACADEMIR CHARTER SCHOOLS, INC.'S**  
**RULE 26 UPDATED INITIAL DISCLOSURES**

Defendant, ACADEMIR CHARTER SCHOOLS, INC. (“AcadeMir” or  
“Defendant”), by and through their undersigned attorneys and pursuant to Federal Rule of  
Civil Procedure 26(a)(1), hereby serve the following Initial Disclosures in this matter:

**PRELIMINARY STATEMENT**

This disclosure statement is submitted without waiver of any applicable privilege or  
protection from disclosure, such as the attorney-client and/or work-product privileges.  
Defendant reserves the right to object to discovery and/or admissibility at trial of any  
information contained in or derived from this disclosure statement. Defendant does not  
concede the relevancy of any information contained in or derived from this disclosure  
statement. Defendant reserves the right to rely upon the individuals identified in this

disclosure statement for subjects other than those identified herein for any reason, including, but not limited to, responding to Plaintiff or Co-Defendant's disclosures, discovery requests, evidence, and testimony. Defendant reserves the right to supplement these disclosures if and when additional responsive information becomes available.

**1. Individuals Likely to Have Discoverable Information:**

**a. Jane Doe, Plaintiff**

c/o Derek Smith Law Group, PLLC  
520 Brickell Key Drive, Suite O-301  
Miami, FL 33131

**Subject:** The Plaintiff has discoverable information pertaining to facts and circumstances concerning her educational enrollment and experience at AcadeMir, the damages she is claiming, and other matters that may be used to support Defendant's defenses.

**b. Mother Doe and Father Doe**

c/o Derek Smith Law Group, PLLC  
520 Brickell Key Drive, Suite O-301  
Miami, FL 33131

**Subject:** Mother Doe and Father Doe likely have knowledge regarding Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, any actions taken by Defendants' in response to Plaintiff's claims, and the alleged damages Plaintiff sustained as a result of Defendants' conduct.

**c. L.R. and L.R.'s Parents or Legal Guardians**

Address currently unknown

**Subject:** L.R. and his parents or legal guardians likely have knowledge regarding Plaintiff's allegations made in the Complaint and any actions taken by Defendants' in response to Plaintiff's claims.

**d. Rolando Mir**

c/o Kelley Kronenberg  
10360 West State Road 84  
Fort Lauderdale, Florida 33324

**Subject:** Rolando Mir likely has knowledge regarding Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants' in response to Plaintiff's claims.

e. **Zoley Castellon**

c/o Kelley Kronenberg  
10360 West State Road 84  
Fort Lauderdale, Florida 33324

**Subject:** Zoley Castellon likely has knowledge regarding Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants' in response to Plaintiff's claims.

f. **Hira Chaudry**

c/o Kelley Kronenberg  
10360 West State Road 84  
Fort Lauderdale, Florida 33324

**Subject:** Hira Chaudry likely has knowledge regarding Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants' in response to Plaintiff's claims.

g. **Melissa Valladares**

c/o Kelley Kronenberg  
10360 West State Road 84  
Fort Lauderdale, Florida 33324

**Subject:** Melissa Valladares likely has knowledge regarding Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants' in response to Plaintiff's claims.

h. **Susie Bello**

c/o Kelley Kronenberg  
10360 West State Road 84  
Fort Lauderdale, Florida 33324

**Subject:** Susie Bello likely has knowledge regarding Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants' in response to Plaintiff's claims.

i. **Rosemarie Mortazavi**

c/o Kelley Kronenberg  
10360 West State Road 84  
Fort Lauderdale, Florida 33324

**Subject:** Rosemarie Mortazavi likely has knowledge regarding Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants' in response to Plaintiff's claims.

j. **Stephanie Ruiz**

9040 SW 125<sup>th</sup> Avenue, Apt. 408  
Miami, FL 33186

**Subject:** Stephanie Ruiz likely has knowledge regarding Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants' in response to Plaintiff's claims.

- k. **Miami-Dade Police Department**  
**Officer N. Almaguer, Baded No. 10193**  
9105 NW 25th Street  
Doral, FL 33172

**Subject:** The Miami Dade Police Department likely has knowledge of their response to a report made by Mother Doe no or around January 25, 2023, the responding officer's actions and responses to the report, and the incident report generated by the responding officer.

- l. All witnesses disclosed by Plaintiff through Rule 26 Disclosures and/or discovery.
- m. Defendants reserve the right to supplement or amend these disclosures based on information obtained in the course of discovery or through further factual investigation.

**2. Documents, Information, and Things in the Possession, Custody, or Control of Defendant that Defendant May Use to Support Its Defenses**

- a. The Miami-Dade School Board's Code of Student Conduct
- b. Miami-Dade Police Department's Offense-Incident Report and Contact/Case Report
- c. AcadeMir Charter School's Title IX Policies and Procedures
- d. AcadeMir Charter School's Employee Handbook
- e. AcadeMir's Student Case Management Students Services Forms
- f. AcadeMir's Title IX Complaint Form
- g. Miami-Dade County Public School's Title IX Policies and Procedures
- h. Amended Charter School Management Agreement between AcadeMir Charter School West and Superior Charter School Services, Inc.

- i. Six surveillance footage tapes depicting Jane Doe's classroom on January 20, 2023
- j. One surveillance footage tape depicting Mother Doe and Father Doe's meeting with AcadeMir staff on January 24, 2023
- k. One surveillance footage tape depicting Father Doe's meetings with Academir Staff on January 25, 2023
- l. Florida Department of Children and Families' Intake Report
- m. Miami-Dade Police Department's entire body camera footage of conversations with Father Doe and Academir on January 25, 2023
- n. All documents identified in Plaintiff and Co-Defendant's Rule 26 Disclosures and any corresponding supplemental disclosures
- o. Defendant reserves the right to add additional documents, information and things in the possession, custody, or control of Defendants that they may use to support Defendant's defenses based on information obtained in the course of discovery or through further factual investigation.

**3. Computation of Claimed Damages and Documents and Evidence on Which Computations are Based:**

- a. Not applicable to Defendant.

**4. Insurance Agreements Under Which an Insurance Business May Be Liable to Satisfy All or Part of a Possible Judgment in This Action or to Indemnify or Reimburse for Payments Made to Satisfy the Judgment:**

- a. American Alternative Insurance Company- Umbrella Policy #93A2UB3000744-06
- b. Munich Re- MRSI Policy- Claim #005617-002434-GB-01

Dated: September 11, 2024

Respectfully Submitted,

**KELLEY KRONENBERG**

/s/ Julie B. Karron

**JULIE B. KARRON, ESQ.**

Fla. Bar No.: 14683

10360 West State Road 84

Fort Lauderdale, FL 33324  
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Attorneys for Defendant, Academir Charter  
Schools, Inc.  
jkarron@kelleykronenberg.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was served via electronic mail delivery on September 11, 2024, to Kyle T. MacDonald, Esq., Derek Smith Law Group, PLLC, 701 Brickell Avenue, Suite 1310, Miami, FL 33131, at kyle@dereksmithlaw.com (Attorneys for Plaintiff) and Scott Yount, Esq. and Julie McHaffie, Esq., Garrison, Yount, Forte & Mulcahy, LLC, 601 Bayshore Blvd., Suite 800, Tampa, FL 33606 at syoung@garrisonyount.com ; jmchaffie@garrisonyount.com (Attorneys for Superior Charter School Services, Inc.)

/s/ Julie B. Karron  
Florida Bar. No.: 14683